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11 Attorneys for Plaintiffs
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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 ENVIRONMENTAL PROTECTION
INFORMATION CENTER, et al.,

17 Plaintiffs,

18 vs.
19

20 ALECIA VAN ATTA, et al.,

21 Defendants.
22

Case No. 3:22-cv-03520-TLT

**DECLARATION OF SANGYE
INCE-JOHANNSEN IN SUPPORT
OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS,
AND OTHER EXPENSES**

1 I, Sangye Ince-Johannsen, hereby declare as follows:

2 1. I am a staff attorney with the Western Environmental Law Center. I served as counsel for
3 Plaintiffs in this case. I submit this declaration in support of Plaintiffs' motion for an award of
4 attorneys' fees, costs, and other expenses pursuant to the Equal Access to Justice Act ("EAJA").
5 28 U.S.C. §§ 2412 *et seq.*

6 2. I earned my Bachelor of Arts *summa cum laude* from Southern Oregon University in
7 2012. I subsequently enrolled at Lewis & Clark Law School, which I selected specifically
8 because of its renowned environmental law program. During my legal education, I completed
9 specialized coursework in administrative law, environmental law, and federal jurisdiction,
10 among other relevant subjects.

11 3. My professional training included a position at Earthrise Law Center in San Francisco
12 during my first law school summer, where I contributed to active litigation seeking to compel
13 Forest Service actions mandated in a forest plan, and disclosure of improperly withheld
14 documents under the Freedom of Information Act. During my second law school summer, I
15 worked for the Center for Biological Diversity in Portland, Oregon, where I drafted portions of
16 an amicus brief opposing a petition to delist the endangered Golden-cheeked warbler under the
17 Endangered Species Act ("ESA"), and assisted attorneys developing a legal strategy for
18 challenging executive branch actions taken without authority under the Federal Vacancies
19 Reform Act and the Appointments Clause. I continued to work for the Center for Biological
20 Diversity over fall semester of my third year, through an externship placement with attorneys in
21 the discovery phase of an ESA lawsuit challenging steep-slope logging in the Oregon Coast
22 Range harming threatened native Coho salmon. In that capacity, I reviewed, prepared, and
23 classified materials for discovery, and captured aerial photographs of landslides found near
24 recent logging sites.

25 4. While in law school, I served as an editor for the *Environmental Law Review*, where I
26 edited and cite-checked scholarly submissions and authored case summaries for its subsidiary
27 publication, the *Ninth Circuit Review*.
28

5. While in law school, I distinguished myself as a member of the environmental law moot court team, advancing through intramural competition to achieve a position on the three-student national team. Among the approximately 60 law school teams competing in 2019, our team reached the quarterfinals at the 2019 National Environmental Law Moot Court Competition at Pace Law School in New York.

6. In 2019, I graduated *cum laude* from Lewis & Clark Law School, completing my J.D. and earning certificates in Environmental and Natural Resources Law and in International Law. Lewis & Clark Law School awarded me both the Williamson Public Interest Environmental Law Award, for demonstrating exceptional commitment, vision, leadership, and creativity in the field of public interest environmental law; and the Environmental, Natural Resources, and Energy Law Leadership Award, for making significant contributions to the school's environmental, natural resources, and energy law program over the course of my studies.

7. In 2019, I joined the Western Environmental Law Center as a two-year legal fellow. The firm promoted me to staff attorney in 2020, before my fellowship ended. I have focused on federal environmental litigation concerning wildlife and public land management, with particular emphases on the National Environmental Policy Act and the ESA.

8. I have represented clients in cases brought under the ESA, the National Environmental Policy Act, the Clean Water Act, and the Administrative Procedure Act. These cases include *Back Country Horsemen of America v. U.S. Forest Service*, 19-cv-02149 (E.D. Cal.); *WildEarth Guardians v. U.S. Forest Service*, 1:19-cv-00203-CWD (D. Idaho) and *WildEarth Guardians v. U.S. Forest Service*, 23-35352 (9th Cir.) (oral argument); *Klamath-Siskiyou Wildlands Center v. Bureau of Land Management*, 19-cv-01810 (D. Or.) and *Klamath-Siskiyou Wildlands Center v. Bureau of Land Management*, 22-35035 (9th Cir.); *In re Clean Water Act Rulemaking*, 3:20-cv-04636-WHA (N.D. Cal.), *In re American Rivers v. American Petroleum Institute*, 21-16958 (9th Cir.), and *Louisiana v. American Rivers*, 142 S.Ct. 1347 (2022); *Klamath-Siskiyou Wildlands Center v. U.S. Fish and Wildlife Service*, 1:20-cv-00952-AA (D. Or.); *Klamath-Siskiyou Wildlands Center v. U.S. Fish and Wildlife Service*, 1:21-cv-00058-CL (D. Or.); *Willamette RiverKeeper v. National Marine Fisheries Service*, 6:21-cv-00034-AA (D. Or.); *Cascadia*

1 *Wildlands v. Adcock*, 6:22-cv-00767-AA (D. Or.); *Envtl. Prot. Info. Ctr. v. Nat'l Marine*
 2 *Fisheries Service*, 3:22-cv-03520-TLT (N.D. Cal.); *Envtl. Prot. Info. Ctr. v. U.S. Fish and*
 3 *Wildlife Service*, 2:23-cv-02611-TKN-KJN (E.D. Cal.); and *Envtl. Prot. Info. Ctr. v. U.S. Fish*
 4 *and Wildlife Service*, 1:25-cv-03049-RMI (N.D. Cal.).

5 9. From 2019 to 2024, I served each semester as the supervising attorney for one or more
 6 students enrolled in the Environmental Law Clinic at University of Oregon School of Law. From
 7 2022 to 2024, I co-taught the Environmental Law Clinic as a pro tem instructor for the
 8 University of Oregon School of Law.

9 10. Since 2019, I have mentored Lewis & Clark Law School students pursuing careers in
 10 public interest environmental law. From 2019 to 2022, I participated as a volunteer judge for
 11 Lewis & Clark Law School's environmental law moot court team, helping it prepare for the
 12 National Environmental Law Moot Court Competition at Pace Law School.

13 11. In 2023, I served as a panelist at the Public Interest Environmental Law Conference at the
 14 University of Oregon School of Law, analyzing the ESA implications of the Bureau of Land
 15 Management ("BLM")'s resource management plan implementation in western Oregon under
 16 the Federal Land Policy and Management Act. My analysis drew on insights from my recent
 17 successful representation of clients in federal litigation brought under Section 7(a)(2) of the ESA,
 18 addressing effects of two BLM timber sales on the northern spotted owl.

19 12. In my capacity as counsel for Plaintiffs in this matter, I conducted work including, but
 20 not limited to, reviewing agency documents and the administrative record, researching and
 21 developing legal theories and strategies, preparing pleadings, drafting and filing briefs, and
 22 discussing the matter with Plaintiffs and opposing and co-counsel.

23 13. I attach as Exhibit A my time sheets in this case. I recorded time in six-minute increments
 24 and rounded up to the nearest decimal. I generally kept my time and expense reports
 25 contemporaneously. Since June 1, 2023, I have used automated time-tracking software to verify
 26 entries. My time sheets accurately reflect the time I spent working on this case. Exercising sound
 27 billing judgment, I have carefully reviewed my time sheets and omitted excessive, redundant,
 28 and otherwise unnecessary time. I claim at total of 341.90 hours working on this case.

1 14. Based on my qualifications, experience, and the demands of this case, I seek market rates
2 under EAJA in the forum of San Francisco of \$450 in 2021, \$465 in 2022, \$480 in 2023, \$495 in
3 2024, and \$510 in 2025. Multiplying reasonable hours by reasonable rate, I seek \$160,678.50 in
4 attorneys' fees.

5 I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C.
6 § 1746(2).

7 Executed on May 1, 2025. /s/ Sangye Ince-Johannsen
8 Sangye Ince-Johannsen
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Date	Attorney	Description	Rate	Time	Omit	Amount
10/26/21	Ince-Johannsen	0.3 - Review case law on ambiguous ITS triggers 0.5 - Outline potential ESA claims 1.8 - Research potential claims 1.2 - Review record / agency docs	450.00	3.80		1,710.00
10/27/21	Ince-Johannsen	1.5 - Review record / agency docs	450.00	1.50		675.00
10/28/21	Ince-Johannsen	0.5 - Review EPIC SHA state case 1.5 - Work up potential claims	450.00	2.00		900.00
10/29/21	Ince-Johannsen	1.6 - Review record	450.00	1.60		720.00
11/1/21	Ince-Johannsen	0.3 - Email Pete re: client meeting planning 2.8 - Review record, work up potential claims	450.00	3.10		1,395.00
11/2/21	Ince-Johannsen	1.5 - Review record, work up potential claims	450.00	1.50		675.00
11/3/21	Ince-Johannsen	0.8 - Review Karuk Tribe letter on SHA DFW 1600 permits, client correspondence thereabout 3.4 - Research whether existing legal duty can be used to mitigate or erase adverse effects of new proposed action, consulting with WELC & other attys on this question	450.00	4.20	4.20	-
11/5/21	Ince-Johannsen	1.7 - Review record, work up potential claims	450.00	1.70		765.00
11/8/21	Ince-Johannsen	0.5 - Prepare & printing materials for client meeting 6.0 - Travel to client meeting	450.00	6.50	6.50	-
11/9/21	Ince-Johannsen	0.6 - Confer Pete ahead of client meeting 6.3 - Client meeting + lunch with clients 3.5 - Return travel from client meeting 0.3 - Review data re: impaired and unimpaired flows 0.8 - Review supplemental materials provided by clients	450.00	11.50	10.40	495.00
11/12/21	Ince-Johannsen	0.5 - Review water board staff report re: baseline temps 4.0 - Outline, draft, edit NMF	450.00	4.50	4.00	225.00
11/15/21	Ince-Johannsen	0.3 - Email AH re: TMDL enforceability	450.00	0.30	0.30	-
11/16/21	Ince-Johannsen	2.2 - Review CHERP BiOp, record	450.00	2.60		1,170.00
11/17/21	Ince-Johannsen	0.3 - Review temperature reports 1.1 - Review record / agency docs	450.00	1.40		630.00
11/18/21	Ince-Johannsen	0.4 - Review coho return data	450.00	0.40		180.00
11/23/21	Ince-Johannsen	1.0 - Research legislative history of section 10(a)(1)(A)	450.00	1.00		450.00
12/2/21	Ince-Johannsen	3.3 - Research & prepare litigation memo on legislative history of ESA 10(a)(1)(A)	450.00	3.30		1,485.00
12/7/21	Ince-Johannsen	0.7 - TC Pete re: ESA claims, § 10 legislative history	450.00	0.70		315.00
12/8/21	Ince-Johannsen	0.7 - Review draft arguments re: temperatures 1.0 - Review Stenhouse 2012 0.8 - Review 2003 temp TMDL	450.00	2.50		1,125.00
12/9/21	Ince-Johannsen	2.8 - Research, email Pete re: legislative history of ESA 10(a)(1)(A), (B) 1.5 - Work up ESA § 10 claims	450.00	4.30		1,935.00
12/10/21	Ince-Johannsen	0.4 - TC Pete re: ESA claims	450.00	0.40		180.00
12/13/21	Ince-Johannsen	0.9 - Research, email Pete re: 10(a)(1)(B) legislative history 1.4 - Research legislative history of ESA § 10(a)(1)(B), writing memo for Pete about it 0.5 - Email DW re: FMS, MWCD's contractual obligations, Hidden Valley Ranch temps 0.7 - Research ESA 10(d), and whether it may give rise to a freestanding violation/claim in this case	450.00	3.30	0.70	1,170.00
12/14/21	Ince-Johannsen	2.4 - Research ESA 10(d), and whether it may give rise to a freestanding violation/claim in this case 1.8 - Work up other ESA § 10 claims	450.00	4.20	2.40	810.00
12/15/21	Ince-Johannsen	0.2 - Email Pete, DW re: FMS	450.00	0.20		90.00
12/20/21	Ince-Johannsen	0.3 - Research legislative history, email Pete	450.00	0.30		135.00
12/22/21	Ince-Johannsen	0.8 - Review client memo 1.1 - Conference TC FoSR re: coho, take, ESA violations 0.4 - TC Pete follow up FoSR conference; ESA claims 0.7 - Review Pete's take memo	450.00	3.00		1,350.00
12/23/21	Ince-Johannsen	1.1 - Review materials provided by DW re: MWCD temp monitoring, releases, obligations	450.00	1.10		495.00
1/3/22	Ince-Johannsen	0.3 - Review clients' top 6 site plans	465.00	0.30		139.50
1/6/22	Ince-Johannsen	0.5 - Review EPA docs from clients 0.7 - Review temperature docs from clients 0.6 - Review SONCC recovery plan	465.00	1.80		837.00
1/7/22	Ince-Johannsen	1.0 - Review Klamath TMDL	465.00	1.00		465.00
1/10/22	Ince-Johannsen	0.4 - Review docs provided by clients	465.00	0.40		186.00
1/11/22	Ince-Johannsen	2.1 - Review FoSR documentation of Shasta conditions, work up claims	465.00	2.10		976.50

Date	Attorney	Description	Rate	Time	Omit	Amount
1/14/22	Ince-Johannsen	0.5 - Reading materials provided by clients 0.2 - Email clients	465.00	0.70	0.20	232.50
1/18/22	Ince-Johannsen	0.6 - Review Shasta River Temp Assessment 0.3 - Review Normandeau study re flows 0.5 - Review Shasta TMDL	465.00	1.60		744.00
1/21/22	Ince-Johannsen	0.5 - Review docs re MWCD discharge permit	465.00	0.50		232.50
1/24/22	Ince-Johannsen	3.5 - Review, draft, edit, working outline of potential claims	465.00	3.50		1,627.50
1/26/22	Ince-Johannsen	0.4 - Review water board letter to Emmerson re: TMDL compliance 0.4 - Review TMDL staff report & maps of tailwater source areas 0.5 - Review client feedback on outline of potential claims	465.00	1.30		604.50
1/27/22	Ince-Johannsen	0.4 - Prepare client email re: docs, violations, potential claims, remedies 0.4 - Review Scott/Shasta FLIR Report 1.1 - Classify, review, annotate docs from FoSR	465.00	1.90		883.50
2/2/22	Ince-Johannsen	2.0 - Work up ESA BiOp claims	465.00	2.00		930.00
2/3/22	Ince-Johannsen	0.5 - Conference TC AH, Pete re: litigation strategy 0.3 - Review comment letter from RWQ re temps 1.0 - Review client-provided docs	465.00	1.80		837.00
2/4/22	Ince-Johannsen	0.4 - TC Pete re: ESA claims, strategy 1.0 - Review client-provided docs	465.00	1.40		651.00
2/8/22	Ince-Johannsen	0.3 - TC Pete re: potential ESA & CWA claims 1.4 - Review client-provided docs, studies, maps 1.6 - Work up ESA claims, develop and edit claim outline doc	465.00	3.30		1,534.50
2/9/22	Ince-Johannsen	0.2 - TC Pete re: § 10 violations 0.9 - Research Water Transfers Rule applicability to Dwinnell 0.3 - Confer & email Pete re: applicability of ESA § 10(d) 0.7 - Research applicability of ESA § 10(d) 1.3 - Review docs from FoSR 0.4 - Review client input on draft claims outline	465.00	3.80	1.00	1,302.00
2/11/22	Ince-Johannsen	0.3 - Email clients 0.9 - Review client-provided docs	465.00	1.20	0.30	418.50
2/14/22	Ince-Johannsen	2.3 - Draft NOI letter	465.00	2.30		1,069.50
2/15/22	Ince-Johannsen	0.4 - TC Mike Belichek & Pete 0.3 - TC Pete re: CWA / WTR 0.6 - Review client provided docs re tailwaters	465.00	1.30		604.50
2/16/22	Ince-Johannsen	0.8 - Review client-provided docs re habitat conditions	465.00	0.80		372.00
2/17/22	Ince-Johannsen	0.5 - Email clients 1.1 - Research, update Pete re: Water Transfers Rule	465.00	1.60		744.00
2/18/22	Ince-Johannsen	0.8 - Review docs, maps provided by FoSR 0.6 - Review client feedback and edits on draft claims outline	465.00	1.40		651.00
2/22/22	Ince-Johannsen	0.8 - Review studies provided by FoSR	465.00	0.80		372.00
2/23/22	Ince-Johannsen	0.1 - TC Pete re: NOI, Press Release 0.4 - Edit Press Release 0.8 - Press Release coordination 0.6 - Edit NOI	465.00	1.90	1.20	325.50
2/24/22	Ince-Johannsen	0.2 - TC Pete re: NOI 0.4 - Email clients re: NOI 0.4 - Review retainer agreements	465.00	1.00	0.40	279.00
2/28/22	Ince-Johannsen	0.8 - Review EPIC & ELF comments for Upper Shasta River streambed alterations 0.3 - Email clients re: NOI	465.00	1.10		511.50
3/11/22	Ince-Johannsen	0.6 - Research case law applicable to ESA claims	465.00	0.60		279.00
3/15/22	Ince-Johannsen	0.4 - TC Pete re: NMFS perspective on NOI 0.2 - Conference TC Pete, Laurie Beale re: NOI	465.00	0.60		279.00
3/22/22	Ince-Johannsen	0.2 - TC Pete & clinic student ahead of TC NOAA attorneys 0.5 - TC NOAA attorneys re: NOI 0.5 - TC Pete re: NOAA response, next steps	465.00	1.20		558.00
3/24/22	Ince-Johannsen	0.2 - Email clients re: NOAA meeting	465.00	0.20		93.00
3/28/22	Ince-Johannsen	0.2 - Email reporter re: NOI 0.3 - Email clients re: NMFS meeting, relief 0.4 - Review issues & ideas for relief	465.00	0.90	0.20	325.50
3/31/22	Ince-Johannsen	0.7 - Conference TC NMFS re: NOI 0.2 - TC Pete re: NMFS meeting, next steps 0.5 - Zoom with Pete, JM, SN re: possible conflicts between Green Diamond and Shasta Coho cases 0.6 - Review DFW report on fish traps, 2020 adult report	465.00	2.00	0.50	697.50

Date	Attorney	Description	Rate	Time	Omit	Amount
4/1/22	Ince-Johannsen	0.2 - Review final retainer agreement 0.2 - Email clients re: retainer, next steps 1.5 - Review case notes, research, claim work-up; outlining arguments	465.00	1.90	0.40	697.50
4/5/22	Ince-Johannsen	1.3 - Zoom TC NMFS staff & counsel re: NOI 0.2 - TC Pete re: NMFS's positions on NOI, SHA	465.00	1.50		697.50
4/22/22	Ince-Johannsen	0.5 - Review NMFS' answers to clients' questions, documents produced	465.00	0.50		232.50
4/26/22	Ince-Johannsen	0.4 - Review docs provided by clients	465.00	0.40		186.00
4/27/22	Ince-Johannsen	1.0 - Analyzing environmental baseline in BiOp	465.00	1.00		465.00
4/28/22	Ince-Johannsen	0.1 - Confer Pete re NOI timing, receipts; 0.3 - Review client comments on Lusardi study	465.00	1.30		604.50
5/9/22	Ince-Johannsen	0.5 - Litigation strategy TC Pete 1.9 - Research, work up ESA claims	465.00	2.40		1,116.00
5/10/22	Ince-Johannsen	0.5 - Research, update Pete re: NMFS FOIA process	465.00	0.50		232.50
5/11/22	Ince-Johannsen	1.0 - Review environmental baseline memo 0.8 - Review flow mgmt schedule docs 3.0 - Work up ITS claims	465.00	4.80		2,232.00
5/12/22	Ince-Johannsen	0.3 - TC/Email Pete re: envtl baseline issue 0.3 - Review SHA re: Lusardi study 2.3 - Work up ESA § 10 claims 1.6 - Work up ITS claims	465.00	4.50		2,092.50
5/16/22	Ince-Johannsen	0.3 - Review FOSR FOIA request 1.8 - Research scope of take immunity under SHA 0.6 - Edit environmental baseline memo 0.7 - Confer AH/MB/Pete re: ITS, take surrogate, etc	465.00	3.40		1,581.00
5/17/22	Ince-Johannsen	1.8 - Work up ESA claims 0.8 - Research ESA § 10(d) issues	465.00	2.60	0.80	837.00
5/18/22	Ince-Johannsen	0.7 - Conference TC Pete & clinic student re: envtl baseline issue 1.0 - Research envtl baseline in prior BiOps 1.1 - Review historic decrees, water rights 1.5 - Work up ESA § 10 claims	465.00	4.30		1,999.50
5/19/22	Ince-Johannsen	0.5 - TC Pete re: ESA claim work-up 1.5 - Research ESA § 10(d) & related issues, work up claims	465.00	2.00	1.50	232.50
5/20/22	Ince-Johannsen	0.3 - Email clients re: water withdrawals, temps 0.2 - TC Pete re ESA claim workup 3.3 - Research, work up ESA / ITS claims	465.00	3.80		1,767.00
5/24/22	Ince-Johannsen	0.5 - TC Pete re: claims work up, action area issue 1.8 - Research, work up ITS claims 3.4 - Outline & draft memo on ITS issues	465.00	5.70		2,650.50
5/25/22	Ince-Johannsen	0.4 - TC Pete re: ESA claims 0.7 - Troubleshoot google drive issues with client	465.00	1.10	0.70	186.00
5/26/22	Ince-Johannsen	1.2 - Review project folder 0.1 - TC Pete re: claims workup	465.00	1.30	1.20	46.50
5/27/22	Ince-Johannsen	0.5 - TC Pete re: claim workup	465.00	0.50		232.50
5/30/22	Ince-Johannsen	2.4 - Receive, validate, setup share, then review NOAA project file	465.00	2.40	2.40	-
5/31/22	Ince-Johannsen	0.5 - TC Pete re: ITS claim	465.00	0.50		232.50
6/1/22	Ince-Johannsen	0.5 - TC comms team re: filing case	465.00	0.50	0.50	-
6/2/22	Ince-Johannsen	0.3 - Review client presentation on coho rearing 0.4 - Review NOAA VSP document 1.1 - Review, edit draft ITS memo 0.5 - TC Pete re: ITS claim	465.00	2.30		1,069.50
6/3/22	Ince-Johannsen	0.3 - Review draft temperature memo 1.2 - Research, edit draft action area memo	465.00	1.50		697.50
6/6/22	Ince-Johannsen	1.0 - TC comms team & clients re: filing case 0.3 - Email clients re: strategy for taking on temperature issues through BiOp challenges 1.0 - Research, email Pete re: possible Govt in the Sunshine Act claim 0.7 - Edit draft ITS memo 0.4 - Edit draft action area argument	465.00	3.40	2.00	651.00
6/7/22	Ince-Johannsen	0.4 - Review info, docs, email clients re: base flows and adult returns 1.3 - Research, edit draft memo re: envtl baseline claim	465.00	1.70		790.50
6/8/22	Ince-Johannsen	1.0 - TC Pete re: BiOp challenges 1.1 - Review case law on BiOps relying on uncertain mitigation measures 0.4 - Review, edit updated draft memo re: BiOp envtl baseline claim 2.6 - Research, outline, email clients re: claim challenging use of safe harbor 0.5 - Edit draft memo re: action area	465.00	5.60		2,604.00

Date	Attorney	Description	Rate	Time	Omit	Amount
6/10/22	Ince-Johannsen	0.5 - TC Pete re: claims workup, use of safe harbor 0.6 - Review background section of complaint 0.4 - Review clients proposed edits to background section of complaint 1.3 - Research history of NMFS's ESP regs 2.5 - Research, edit memo re: use of safe harbor	465.00	5.30		2,464.50
6/14/22	Ince-Johannsen	0.4 - TC Pete re: litigation strategy 0.3 - Email clients re: Novy ranch use of riparian water on nonriparian ground 0.7 - Doc review re: Novy ranch use of riparian water on nonriparian ground 0.5 - Edit press release re: complaint 1.1 - Work up, draft, edit complaint	465.00	3.00	0.50	1,162.50
6/15/22	Ince-Johannsen	0.4 - TC Pete, TW@EPIC re: filing complaint 0.5 - Prepare initial case filings	465.00	0.90		418.50
6/16/22	Ince-Johannsen	0.4 - Review NOAA SHA presentation to KBMP group 0.4 - Read press re: complaint 0.2 - TC Pete 1.1 - Research & Email clients re: applicability of EPA's water transfers rule to safe harbor permittees 0.3 - Research, email clients re: issues with complaint as filed	465.00	2.40	0.70	790.50
6/21/22	Ince-Johannsen	0.3 - TC Pete re: service, PHV, consent to magistrate, next steps 1.4 - Prepare/giving instructions to admin assistant re: service & proof of service of process	465.00	1.70	1.40	139.50
6/22/22	Ince-Johannsen	0.7 - Review MWCD discharge data & reports	465.00	0.70		325.50
6/23/22	Ince-Johannsen	1.5 - Research N.D. Cal judges, prepare advice for clients re: consent to magistrate, TC Pete	465.00	1.50		697.50
6/24/22	Ince-Johannsen	0.3 - TC Pete re: CWA § 401 applicability to SHA 0.5 - Research possible CWA § 401 claim re: Safe Harbor program	465.00	0.80		372.00
7/5/22	Ince-Johannsen	0.1 - Review docket entries 0.5 - Research Judge Corley	465.00	0.60		279.00
7/7/22	Ince-Johannsen	0.4 - Review order on MTD re: complaint failing to identify harmed individuals	465.00	0.40		186.00
7/8/22	Ince-Johannsen	0.6 - Research client duties re: retention of records for discovery 0.2 - Review, edit litigation hold letter 0.2 - Email clients	465.00	1.00	1.00	-
7/21/22	Ince-Johannsen	0.8 - Research/troubleshoot service of process issue with KS	465.00	0.80	0.80	-
7/28/22	Ince-Johannsen	0.2 - Email KS & Pete re: undelivered service packet, next steps 0.5 - Research implications of undelivered service packet, possible reasons	465.00	0.70	0.20	232.50
8/3/22	Ince-Johannsen	0.2 - Review client comments to WRCB re: temperatures 0.3 - Review Klamath R TMDL	465.00	0.50		232.50
8/5/22	Ince-Johannsen	0.2 - Email KS & Pete re: undelivered service packet, next steps	465.00	0.20	0.20	-
8/8/22	Ince-Johannsen	0.3 - Review MWCD 2021 discharge report	465.00	0.30		139.50
8/9/22	Ince-Johannsen	0.5 - Review NMFS's SHA monitoring requirements, other docs sent by clients	465.00	0.50		232.50
8/12/22	Ince-Johannsen	0.6 - TC DOJ counsel 0.3 - TC Pete re: jurisdictional issues, next steps	465.00	0.90		418.50
8/15/22	Ince-Johannsen	0.6 - Review materials provided by clients re: temperature thresholds 0.4 - Reading client memo re: temperature thresholds	465.00	1.00		465.00
8/17/22	Ince-Johannsen	0.6 - Review CHERP BiOp 0.5 - Review materials re: temperatures causing coho displacement	465.00	1.10		511.50
8/18/22	Ince-Johannsen	0.3 - Review curtailment orders, media re: violations	465.00	0.30		139.50
8/22/22	Ince-Johannsen	0.7 - Research, email Pete re: a substantive jeopardy claim proceeding under ESA citizen suit provision	465.00	0.70		325.50
8/23/22	Ince-Johannsen	0.8 - TC Pete re: jurisdictional questions, case mgmt statement, history of NMFS SHA regs 0.5 - Research history of NMFS SHA regs 0.6 - Research, update Pete re: duty of self-consulting agency to avoid jeopardy 0.5 - Research whether substantive ESA claims against self-consulting agency proceed under citizen suit provision 0.5 - Review ND. Cal. guidelines for professional conduct 0.3 - Reading draft SWB order re: illegal diversions, email clients	465.00	3.20		1,488.00
8/29/22	Ince-Johannsen	Review docket entries: 0.1	465.00	0.10		46.50
8/30/22	Ince-Johannsen	Reading articles re: Shasta curtailment disputes: 0.2. Research Shasta curtailments: 0.3.	465.00	0.50		232.50
8/31/22	Ince-Johannsen	Review NMFS's answer: 0.3. Talking with Pete re: NMFS's answer, certification of interested entities: 0.4.	465.00	0.70		325.50

Date	Attorney	Description	Rate	Time	Omit	Amount
9/1/22	Ince-Johannsen	TC Pete re: ADR, certification of interested entities: 0.3. Research requirements for certification of interested entities: 0.5. Review docs provided by clients: 0.3.	465.00	1.10	0.80	139.50
9/2/22	Ince-Johannsen	Research Judge Thompson: 0.4.	465.00	0.40		186.00
9/8/22	Ince-Johannsen	Researching and developing SHA claim: 0.6. Review FOIA responses re: Shasta SHA: 0.3.	465.00	0.90		418.50
9/9/22	Ince-Johannsen	Review new materials provided by clients: 0.3. TC Pete: 0.2.	465.00	0.50		232.50
9/22/22	Ince-Johannsen	Review info re: Shasta temperature standards: 0.4. Review EPA temperature guidance: 0.3. Email clients re: standing declarants, membership policies: 0.2. Research case law re: standing declarant membership in organization: 0.7.	465.00	1.60		744.00
9/23/22	Ince-Johannsen	TC Pete re: ADR requirements: 0.2.	465.00	0.20		93.00
9/25/22	Ince-Johannsen	Reading CA state court decision re: Scott & Shasta coho permitting program: 0.5. Review client write-up re: temperature standards: 0.3.	465.00	0.80		372.00
9/26/22	Ince-Johannsen	Review materials on temps (0.6) Email clients re: Shasta River temp issue (0.2)	465.00	0.60		279.00
9/27/22	Ince-Johannsen	TC Pete re: ADR, case mgmt (0.6) Email DOJ re: ADR, case mgmt (0.1) Review mono lake public trust decision (0.3)	465.00	1.00	0.30	325.50
9/28/22	Ince-Johannsen	Confer Pete re: ESA issues in case (0.3) Research scope of jeopardy analysis (0.8) Research case law re: ESA action area (0.4)	465.00	1.50		697.50
9/29/22	Ince-Johannsen	Research case law re: jeopardy for actions that create marginal improvement over baseline (0.6) TC Pete re: jeopardy - baseline interplay (0.2)	465.00	0.80		372.00
10/5/22	Ince-Johannsen	Emails re: press strategy (0.2) Emails from clients re: MWCD (0.3)	465.00	0.50	0.20	139.50
10/6/22	Ince-Johannsen	Review materials re: CHERP temps (0.3) Review new info re: MWCD diversion sent from clients (0.4)	465.00	0.70		325.50
10/7/22	Ince-Johannsen	Working up § 7 jeopardy claim (0.3) TC Pete re: jeopardy claim (0.2)	465.00	0.50		232.50
10/10/22	Ince-Johannsen	Emails from clients re: MWCD (0.2)	465.00	0.20		93.00
10/14/22	Ince-Johannsen	TC Pete re case work up, scheduling, CMS (0.3) Review, edit draft CMS (0.6)	465.00	0.90	0.30	279.00
10/16/22	Ince-Johannsen	Review, edit draft CMS (0.8) Email Pete re: CMS (0.2) Research case law on implied causes of action (0.4) Email Pete re: APA vs. ESA cause of action (0.3)	465.00	1.70	1.00	325.50
10/18/22	Ince-Johannsen	Emails from clients re: MWCD (0.3)	465.00	0.20		93.00
10/21/22	Ince-Johannsen	Research scope of jeopardy analysis (1.4)	465.00	1.40		651.00
10/24/22	Ince-Johannsen	TC Pete re: claim work up, scheduling, CMS (0.4) Reading briefing re: scope of jeopardy analysis (0.7)	465.00	1.10		511.50
10/25/22	Ince-Johannsen	Conference TC DOJ re: CMS (0.7) Review, edit draft CMS (0.6) TC Pete re: CMS (0.6) Email Pete re: CMS (0.2)	465.00	2.10	2.10	-
10/26/22	Ince-Johannsen	Review, email Pete & DOJ re: joint CMS (0.3) TC Pete re: CMS (0.3)	465.00	0.60	0.60	-
10/27/22	Ince-Johannsen	TC Pete re: litigation strategy, MWCD (0.5) Review, email Pete & DOJ re: joint CMS (0.2) Email clients re: standing declarations (0.1)	465.00	0.70	0.20	232.50
11/4/22	Ince-Johannsen	Review Tenaya declaration (0.3) Confer Pete re: Tanaya dec contents (0.2)	465.00	0.50		232.50
11/11/22	Ince-Johannsen	Calls, emails re: DOJ's intention to seek clarification on CMS (0.2)	465.00	0.20	0.20	-
11/14/22	Ince-Johannsen	Emails re: DOJ's intention to seek clarification on CMS (0.3) TC Pete re litigation strategy (0.6)	465.00	0.90	0.30	279.00
11/17/22	Ince-Johannsen	Research availability of Zoom recording of CM hearing (0.8)	465.00	0.80	0.80	-
11/17/22	Ince-Johannsen	Confer Pete re litigation strategy, claims (0.5)	465.00	0.50		232.50
11/18/22	Ince-Johannsen	Email Pete re: potential APA claims (0.2) Research potential APA claims (0.4) Review revised CM & scheduling order (0.1)	465.00	0.70	0.10	279.00
11/21/22	Ince-Johannsen	Research, work up ITS arguments (0.7) Research, work up action area arguments (1.2)	465.00	1.90		883.50
11/23/22	Ince-Johannsen	Search ESA legislative history re Section 10 (0.5)	465.00	0.50		232.50
11/29/22	Ince-Johannsen	Review McBain comments on SHA (0.5)	465.00	0.50		232.50

Date	Attorney	Description	Rate	Time	Omit	Amount
11/30/22	Ince-Johannsen	TC Scott McBain re: SHA, BiOp, temperatures & flows (1.0) Debrief with Pete after McBain call (0.2) Review N.D. Cal. local rules on filing amended complaints (0.3) Email clients re: Press Release (0.3) Edit ITS memo (1.4) Edit action area memo (0.8) Edit environmental baseline memo (1.3)	465.00	5.30	0.30	2,325.00
12/1/22	Ince-Johannsen	Review NCRWQCB report about Emerson site visit (0.8)	465.00	0.80		372.00
12/6/22	Ince-Johannsen	Confer Pete re: temperature claim memo (0.2) Confer Pete re: amended complaint proposal (0.2)	465.00	0.40		186.00
12/8/22	Ince-Johannsen	Confer Pete re: temperature claim memo, litigation strategy (0.5)	465.00	0.50		232.50
12/13/22	Ince-Johannsen	Confer Pete re: litigation strategy (0.3) Research source of 16' C threshold for core rearing (0.3)	465.00	0.60		279.00
12/15/22	Ince-Johannsen	Confer Pete re: litigation strategy, plan (0.4) Email clients re: litigation strategy, updates (0.3)	465.00	0.70		325.50
12/21/22	Ince-Johannsen	Review, edit draft amended complaint (0.6)	465.00	0.60		279.00
12/27/22	Ince-Johannsen	Review common interest agreement (0.4)	465.00	0.40		186.00
1/3/23	Ince-Johannsen	Review draft press release [0.2] Confer clients re: PRA reqs [0.2]	480.00	0.40	0.20	96.00
1/4/23	Ince-Johannsen	Strategy Email clients [0.1] Review Joslin dec [0.3]	480.00	0.40		192.00
1/5/23	Ince-Johannsen	Confer Pete re: summary judgment strategy [0.2]	480.00	0.20		96.00
1/6/23	Ince-Johannsen	TC Pete re: summary judgment strategy [0.3] Download & Review AR, review index, organization, contents [0.1]	480.00	0.40		192.00
1/9/23	Ince-Johannsen	Review, edit Gensaw dec [0.6] Confer Pete re Gensaw dec [0.2] Confer Pete re contents of AR [0.5] Review AR index [0.3] Search AR for project file docs [0.3] Search AR for SONCC RP, SR, VSP study, CHERP BiOp, McBain 2013, Stenhouse 2012, NCRWQCB docs, other studies [0.5] Confer DOJ re amending complaint [0.2]	480.00	2.60		1,248.00
1/10/23	Ince-Johannsen	Search AR for MWCD restoration project BA [0.2] Review AR index [0.5] Review AR References [1.4] TC Pete re AR review, amended complaint [0.4]	480.00	2.50		1,200.00
1/11/23	Ince-Johannsen	Review AR Draft Docs [1.1] Review AR Emails [0.3] Answering client questions re: AR [0.5]	480.00	1.90		912.00
1/12/23	Ince-Johannsen	Confer Pete re MSJ, AR, strategy [1.1]	480.00	1.10		528.00
1/13/23	Ince-Johannsen	Confer Pete re AR, summary judgment strategy [0.3] Confer clients re: AR [0.2]	480.00	0.50		240.00
1/17/23	Ince-Johannsen	Review AR References [0.8] Review AR final decision docs [0.7] Confer clients re: AR [0.2]	480.00	1.70		816.00
1/18/23	Ince-Johannsen	Research SONCC 4(d) rules [0.7] Confer Pete re SONCC 4(d) rules [0.2]	480.00	0.90		432.00
1/19/23	Ince-Johannsen	Review AR References [0.6] Review AR emails [1.2] Review AR draft docs [0.3] TC Pete re AR review [0.2]	480.00	2.30		1,104.00
1/20/23	Ince-Johannsen	Confer Pete re AR review [0.2] Search AR for CDFW annual salmonid reports [0.2] Search AR for outmigrant monitoring reports [0.2] Search AR for Shasta TMDL or supporting docs [0.3] Review AR references [0.6]	480.00	1.50		720.00
1/23/23	Ince-Johannsen	Confer Pete re AR [0.2]	480.00	0.20		96.00
1/24/23	Ince-Johannsen	Review AR emails [0.5] Review AR references [1.3] Review AR draft docs [0.6] TC Pete re AR, strategy [0.7]	480.00	3.10	0.70	1,152.00

Date	Attorney	Description	Rate	Time	Omit	Amount
1/25/23	Ince-Johannsen	Review AR draft docs [0.5] Review AR references [1.2] Search AR for CDFW outmigrant reports [0.2] Search AR for cites to Lestelle 2012 [0.1] Search AR for cites to EPA 2013 [0.3] Review Bauer 1999, Dunham 2001, Materna 2001, McCullough 1999 [0.8] Confer Pete re email to DOJ re completeness of AR, missing docs [0.3]	480.00	3.40		1,632.00
1/26/23	Ince-Johannsen	Email DOJ re supp of AR [0.1] Confer Pete re supplementation of AR [0.2] Confer Pete re MSJ [0.5] Confer FoSR re legal effect of responses to comments [0.2] Review recent case law on judicial notice of materials outside AR [0.3]	480.00	1.30		624.00
1/30/23	Ince-Johannsen	Confer Pete re docs missing from AR [0.2] Confer Pete re MSJ [0.3]	480.00	0.50		240.00
2/1/23	Ince-Johannsen	Review fed. defs answer to amended cmplt [0.4] Edit MSJ brief [0.8]	480.00	1.20		576.00
2/1/23	Ince-Johannsen	Search AR for juvenile outmigrant reports [0.4]	480.00	0.40		192.00
2/2/23	Ince-Johannsen	Confer Pete re incomplete AR, strategy [0.3] Confer Pete re MSJ opening memo [0.7]	480.00	1.00		480.00
2/3/23	Ince-Johannsen	Confer Pete re MSJ opening memo [0.4]	480.00	0.40		192.00
2/6/23	Ince-Johannsen	Confer Pete re MSJ [0.9] Review, edit draft MSJ [1.6]	480.00	2.50		1,200.00
2/7/23	Ince-Johannsen	Research case law re: major federal action' under NEPA [0.7] Confer Pete re MSJ, NEPA arguments [0.4] Confer Pete re: net conservation benefit claim [0.2] Confer Pete re: action area claim [0.3]	480.00	1.60		768.00
2/8/23	Ince-Johannsen	Search AR for comment letters [0.8] Research, draft claim challenging use of safe harbor / NCB finding [1.1] Confer Pete re: NEPA comment letters missing from AR [0.2] Confer Pete re MSJ [0.2] Confer DOJ counsel re NEPA comment letters missing from AR [0.2]	480.00	2.50		1,200.00
2/10/23	Ince-Johannsen	Confer Pete re MSJ claims, strategy [0.3]	480.00	0.30		144.00
2/12/23	Ince-Johannsen	Edit draft MSJ opening memo [2.2] Research, draft NCB claim [0.5] Research, edit envtl baseline claim [0.9] Review, edit temperatures claim [1.0]	480.00	4.60		2,208.00
2/13/23	Ince-Johannsen	Confer Pete re MSJ opening brief [0.4] Review, edit temperatures section of brief [0.8] Review, edit MSJ opening brief [2.3] Conference TC FoSR re draft MSJ opening brief [0.5]	480.00	4.00		1,920.00
2/14/23	Ince-Johannsen	Confer Pete re MSJ draft opening memo, ESA claims [0.3] Confer Pete re NEPA challenge to FONSI [0.2] Research case law on NEPA challenges to FONSI vs. failure to prepare EIS [0.3] Review, edit MSJ draft opening memo [2.4] Review, categorizing provisions of Site Plan Agreements [2.8]	480.00	5.00		2,400.00
2/15/23	Ince-Johannsen	Review, categorizing provisions of Site Plan Agreements [4.2] Review, edit draft section of MSJ opening brief re monitoring [0.5] Confer Pete re MSJ opening brief progress [0.4]	480.00	5.10		2,448.00
2/16/23	Ince-Johannsen	Confer Pete re MSJ opening brief progress, next steps [1.7] Research ESA regs, case law re ITS monitoring obligation [0.5] Confer Pete re monitoring claim, regs for ITS monitoring [0.3] Review, categorizing provisions of Site Plan Agreements [2.5]	480.00	5.00		2,400.00
2/17/23	Ince-Johannsen	Confer Pete re MSJ opening memo [0.5] Confer AH re MSJ opening memo, ITS claim [0.4] Review AH's comments on draft MSJ opening brief [0.3] Review, edit draft MSJ opening memo [1.9]	480.00	3.10		1,488.00
2/19/23	Ince-Johannsen	Confer Pete re NEPA compliance with law significance factor, Shasta TMDL [0.7] Review, edit draft MSJ opening brief [1.3] Review, corresponding re DW's draft map of Shasta River basin [0.2]	480.00	2.20		1,056.00
2/20/23	Ince-Johannsen	Confer AH re applicability of TMDLs to NEPA compliance with law significance factor [0.2] Research applicability of TMDLs to NEPA compliance with law significance factor [1.3] Confer Pete re claim on NEPA compliance with law significance factor [0.5] Review, edit draft MSJ opening brief [1.5]	480.00	3.50		1,680.00

Date	Attorney	Description	Rate	Time	Omit	Amount
2/22/23	Ince-Johannsen	Confer Pete re MSJ opening brief [0.5] Conference TC FoSR clients re MSJ opening brief, factual sections [0.3] Review, edit MSJ opening brief [2.2] Research, draft MSJ challenge to use of SH [2.3]	480.00	5.30		2,544.00
2/23/23	Ince-Johannsen	Confer Pete re vacatur vs injunctive relief, necessity of relief decs [0.4] Confer Pete re MSJ opening brief [0.7] Research, work up challenge to use of SH [2.3] Review, proposing edits to Joslin standing dec [0.5] Research, incorporating into brief ESA legislative history re 10(a)(1)(A) and 10(a)(1)(B) permits [0.8] Review, edit draft MSJ opening brief [1.1]	480.00	5.80		2,784.00
2/24/23	Ince-Johannsen	Confer Pete re: finalizing, formatting & filing MSJ brief, declarations [2.0]	480.00	2.00	2.00	-
2/24/23	Ince-Johannsen	Review, edit draft MSJ opening memo [1.4] Confer FoSR re Joslin dec [0.2] Edit Joslin standing dec [0.9] Cite-check opening MSJ memo [2.6] Prepare tables, formatting opening MSJ memo [1.3] Prepare opening MSJ memo and supporting declarations for filing [0.5] Filing MSJ opening memo & supporting declarations [0.4]	480.00	7.30	1.70	2,688.00
2/25/23	Ince-Johannsen	Confer clients re filed opening MSJ memo, strategy [0.5]	480.00	0.50		240.00
2/27/23	Ince-Johannsen	Confer Pete re: AR supplementation (0.2)	480.00	0.20		96.00
3/9/23	Ince-Johannsen	Review supplemental AR (1.9) Confer Pete re supp AR (0.3)	480.00	2.20		1,056.00
3/20/23	Ince-Johannsen	Confer Pete re changes to briefing schedule (0.2) Review recent case filings (0.5) Corresponding with DOJ counsel re: briefing schedule (0.3)	480.00	1.00		480.00
3/24/23	Ince-Johannsen	Confer DOJ re new date for hearing (0.2) Review new case mgmt order (0.2)	480.00	0.40		192.00
4/14/23	Ince-Johannsen	Review MSJ materials, evaluate next steps (0.5)	480.00	0.50		240.00
4/18/23	Ince-Johannsen	Review opening MSJ (0.2)	480.00	0.20		96.00
4/20/23	Ince-Johannsen	Confer Pete re MSJ strategy (0.2)	480.00	0.20		96.00
4/25/23	Ince-Johannsen	TC Pete re Defs. X-MSJ (0.5) Reading Defs. X-MSJ (0.8) Diagramming arguments in X-MSJ (1.8)	480.00	3.10		1,488.00
5/2/23	Ince-Johannsen	Review AR (1.0), outlining MSJ arguments (2.0) Confer Pete re MSJ arguments (0.6)	480.00	2.60		1,248.00
5/3/23	Ince-Johannsen	Research, draft MSJ response brief (2.8)	480.00	2.80		1,344.00
5/5/23	Ince-Johannsen	Research legislative vs. interpretive rule distinction (3.4) Drafting response brief re: SH policy's status under APA (1.0)	480.00	4.40		2,112.00
5/8/23	Ince-Johannsen	Research, draft MSJ response brief (1.9)	480.00	1.90		912.00
5/9/23	Ince-Johannsen	Research, draft MSJ response brief (1.5) Confer Pete re MSJ response (0.3) Research legislative vs. interpretive rule distinction (0.4)	480.00	2.20		1,056.00
5/11/23	Ince-Johannsen	Confer Pete re Chesney dec merits (0.3) Organizing shared supp AR access (0.5)	480.00	0.80	0.50	144.00
5/12/23	Ince-Johannsen	Research, outlining arguments re enforceability of SH policy (2.0)	480.00	2.00		960.00
5/15/23	Ince-Johannsen	Outline, draft standing argument (0.5) Drafting argument re: enforceability of SH Policy (1.2)	480.00	1.70		816.00
5/16/23	Ince-Johannsen	Outline, draft response to standing arguments (3.2)	480.00	3.20		1,536.00
5/17/23	Ince-Johannsen	TC Pete re MSJ response (0.2) Review, edit ITS section of brief (1.1) Drafting response re: standing (1.5) Review, edit Pete sections of response brief (0.5)	480.00	3.30		1,584.00
5/19/23	Ince-Johannsen	TC Pete re MSJ response workup (0.8) Review, edit draft temperatures piece of argument (0.4)	480.00	1.20		576.00
5/21/23	Ince-Johannsen	TC Pete re MSJ response workup (0.6) Edit action area argument (1.2) Edit temperatures argument (0.8) Edit SH Policy argument (1.5)	480.00	4.10	0.40	1,776.00
5/22/23	Ince-Johannsen	TC Pete re MSJ response (0.3) Drafting, edit MSJ response (4.0) Review temperatures piece of argument (0.5) Confer Pete re action area argument (0.4) Email clients (0.4)	480.00	6.00	0.40	2,688.00
5/23/23	Ince-Johannsen	TC Pete re MSJ response (0.1) Edit MSJ response (3.2) Declarations workup (1.0)	480.00	4.30		2,064.00

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5/24/23	Ince-Johannsen	TC Pete re MSJ response, next steps (0.8) Edit MSJ response (3.0) Review, edit draft PO (0.3) Finalizing brief & accompanied filings (1.5) Prepare tables (1.2)	480.00	6.80	1.20	2,688.00
5/25/23	Ince-Johannsen	Confer Pete re MSJ response filing (0.4) File MSJ response (0.4)	480.00	0.80	0.80	-
5/28/23	Ince-Johannsen	Prepare and submitting proposed orders (0.5)	480.00	0.50		240.00
6/12/23	Ince-Johannsen	Confer Pete re hearing strategy [0.2]	480.00	0.20		96.00
6/15/23	Ince-Johannsen	Review AR [0.2]; Confer Pete re oral argument strategy, questions [0.3]	480.00	0.50		240.00
6/20/23	Ince-Johannsen	Review NMFS MSJ memo [0.4]	480.00	0.40		192.00
6/22/23	Ince-Johannsen	Emails w clients re hearing, NMFS arguments on standing [0.4]; TC Pete re Govt MSJ brief [0.1]; Review government's reply brief [1.0]; Research standing where Ds conduct foreclosed opportunity for future improvements [1.0]; Review NMFS MSJ memo [0.3]	480.00	2.80		1,344.00
6/23/23	Ince-Johannsen	Research rebuttals to govts reply brief, re: safe harbor policy [1.3]; Research rebuttals to govts reply brief, re: standing [1.2]; Research standing theory [0.6]	480.00	3.10		1,488.00
6/27/23	Ince-Johannsen	Review AR, briefing ahead of hearing [1]	480.00	1.00	1.00	-
7/11/23	Ince-Johannsen	Emails re Shasta River media [0.3]; TC Pete re SJ ruling 0.2; Review court's MSJ ruling [0.4]; Confer clients re SJ order [0.5]; Email clients [0.1]	480.00	1.50	0.30	576.00
7/12/23	Ince-Johannsen	Research Rule 59(e) applicability to SJ ruling [0.4]	480.00	0.40		192.00
7/17/23	Ince-Johannsen	Confer clients re SJ order [0.3]	480.00	0.30		144.00
7/20/23	Ince-Johannsen	TC Pete re: case strategy [0.1]	480.00	0.10		48.00
8/1/23	Ince-Johannsen	Emails re Shasta River, status, media 0.3	480.00	0.30	0.30	-
8/21/23	Ince-Johannsen	Relief memo [0.8]	480.00	0.80		384.00
9/11/23	Ince-Johannsen	Review government's response to 59(e) motion	480.00	0.50		240.00
9/29/23	Ince-Johannsen	Confer Pete re: Reply [0.3]	480.00	0.30		144.00
10/2/23	Ince-Johannsen	Emails w clients re: 59(e) reply brief [0.2], Confer Pete re 59(e) strategy, next steps (544 - Shasta Coho) [0.3], review opening 59(e) brief, government's opposition [0.5], review, edit FRCP 59(e) reply brief [0.9]	480.00	1.90		912.00
10/28/23	Ince-Johannsen	Confer Pete re 59(e) strategy, next steps [0.2]	480.00	0.20		96.00
11/3/23	Ince-Johannsen	Confer Pete re obtaining transcripts [0.1]; Review docket entries [0.1]	480.00	0.20	0.20	-
12/7/23	Ince-Johannsen	Review 9th Circuit CBD v. Haaland order re: appealability of our case [0.3]	480.00	0.30	0.30	-
1/25/24	Ince-Johannsen	Confer Pete re D. Ct. order on relief [0.2]	495.00	0.20		99.00
1/25/24	Ince-Johannsen	Review D.Ct. order re relief	495.00	0.10		49.50
3/21/24	Ince-Johannsen	TC Pete re Shasta NOA [0.1]	495.00	0.10	0.10	-
4/25/25	Ince-Johannsen	Review timesheets, edits/omissions [1.2]; review existing declaration, edit [1.4]; TC Pete re rates in forum, proof [1.2]	510.00	1.80		918.00
For Professional Services: Sangye Ince-Johannsen				405.80	63.90	160,678.50

Total Hours	405.80
Total Hours Omitted	63.90
Total Hours after Omissions	341.90

Total Attorneys' Fees **\$ 160,678.50**